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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF ARIZONA**

11 Peter Strojnik, (Sr.),

12 Plaintiff,

13 vs.

14 State Bar of Arizona, an Arizona nonprofit  
15 corporation; Shauna Miller and John Doe  
16 Miller, husband and wife; Maret Vessella  
and John Doe Vessella, husband and wife;  
17 yet unknown Entities and Persons who  
18 participated in the conspiracy alleged  
below,

19 Defendants.  
20

Case No. CV-19-02704-PHX-DJH

**REPLY IN SUPPORT OF REQUEST  
FOR JUDICIAL NOTICE**

21 Defendants State Bar of Arizona (“SBA”), Shauna Miller and John Doe Miller  
22 (“Miller”), and Maret Vessella and John Doe Vessella (“Vessella”) (collectively, “State Bar  
23 Defendants” or “SBA Defendants”) reply in support of their request for judicial notice [Doc.  
24 42].

25 Plaintiff’s singular objection to the SBA Defendants’ request for judicial notice is to  
26 “the Court taking judicial notice of the truth of any statements made in items 2 (Complaint  
27 against Peter Strojnik in PDJ 2018-9105) and 4 (The State Bar of Arizona’s Motion to Strike  
28 in PDJ 2018-9105).” [Doc. 46 at 2]. But Defendants’ request asked only that the listed

1 disciplinary records be judicially noticed for their existence and their reporting of the  
2 circumstances and grounds for discipline and *not* for the truth of the underlying facts. [Doc.  
3 42 at 2].

4 Accordingly, this Court should grant the SBA Defendants' request for judicial notice  
5 for the limited purpose stated in that request.

6 DATED this 26<sup>th</sup> day of August, 2019.

7  
8 **BONNETT, FAIRBOURN, FRIEDMAN &  
BALINT, P.C.**

9  
10 By /s/ Lisa T. Hauser  
11 Lisa T. Hauser  
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15 *Attorneys for Defendant State Bar of Arizona*

16  
17 **CERTIFICATE OF SERVICE**

18  
19 I hereby certify that on this 26<sup>th</sup> day of August, 2019, I electronically transmitted the  
20 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal  
21 of a Notice of Electronic Filing to all parties.

22  
23 /s/ Carolyn Alter  
24 Legal Assistant to Lisa T. Hauser